

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA**

BENJAMIN CRAIG, Individually and on Behalf  
of All Others Similarly Situated,

Case No. 3:17-cv-01005-RGJ-JPM

Plaintiff,

vs.

CENTURYLINK, INC., GLEN F. POST III, and  
STEWART EWING JR.,

Defendants.

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DON J. SCOTT, Individually and on Behalf of All  
Others Similarly Situated,

Case No. 3:17-cv-01033-RGJ-JPM

Plaintiff,

vs.

CENTURYLINK, INC., GLEN F. POST III, R.  
STEWART EWING JR., and DAVID D. COLE

Defendants.

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**[PROPOSED] ORDER FOR CONSOLIDATION, APPOINTMENT AS LEAD  
PLAINTIFF, AND APPROVAL OF SELECTION OF COUNSEL**

Having considered the motion of Proposed Lead Plaintiffs Police and Fire Retirement System of the City of Detroit (“Detroit P&F”) and Laborers Pension Trust Fund – Detroit and Vicinity (“Detroit Laborers”) (collectively, the “Detroit Institutional Investor Group”), for consolidation, appointment as Lead Plaintiff, and approval of selection of Co-Lead Counsel (the “Motion”),

IT IS HEREBY ORDERED THAT:

- I. The Motion is granted.
- II. The above-captioned actions are consolidated for all purposes (the “Consolidated Actions”). This Order (the “Order”) shall apply to the Consolidated Actions and to each case that relates to the same subject matter that is subsequently filed in this Court or is transferred to this Court, and is consolidated with the Consolidated Actions.
- III. A Master File is established for this proceeding. The Master File shall be Civil Action No. 3:17-cv-01005-RGJ-JPM. The Clerk shall file all pleadings in the Master File and note such filings on the Master Docket. Every pleading in the Consolidated Actions shall have the following caption:

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IN RE CENTURYLINK, INC. )  
SECURITIES LITIGATION ) 3:17-cv-01005-RGJ-JPM  
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- IV. Each new case that arises out of the subject matter of the Consolidated Actions shall be consolidated with the Consolidated Actions. This Order shall apply thereto, unless a party objects to consolidation (as provided for herein), or to any provision of this Order, within ten (10) days after the date upon which a copy of this Order is served on counsel for such party by filing an application for relief, and this Court deems it appropriate to grant such application. Nothing in the foregoing shall be construed as a waiver of Defendants’ right to object to the consolidation of any subsequently-filed or transferred related action.

- V. The Detroit Institutional Investor Group is appointed to serve as Lead Plaintiff in the Consolidated Actions pursuant to 15 U.S.C. § 78u-4(a)(3)(B).

VI. The Detroit Institutional Investor Group's selection of Labaton Sucharow LLP and Kirby McInerney LLP as Co-Lead Counsel and Fishman Haygood L.L.P. as Liaison Counsel for the Class is approved pursuant to 15 U.S.C. § 78u-4(a)(3)(B)(v). Co-Lead Counsel shall have the authority to speak for all Plaintiffs and Class members in all matters regarding the litigation, including, but not limited to, pre-trial proceedings, motion practice, trial, and settlement. Co-Lead Counsel shall make all work assignments in such a manner as to facilitate the orderly and efficient prosecution of this litigation, and to avoid duplicative or unproductive effort. Additionally, Co-Lead Counsel shall have the following responsibilities:

- A. to brief and argue motions;
- B. to initiate and conduct discovery, including, but not limited to, coordination of discovery with Defendants' counsel, and the preparation of written interrogatories, requests for admissions, and requests for production of documents;
- C. to direct and coordinate the examination of witnesses in depositions;
- D. to act as spokesperson at pretrial conferences;
- E. to initiate and conduct any settlement negotiations with Defendants' counsel;
- F. to consult with and employ experts;
- G. to receive and review periodic time reports of all attorneys on behalf of Plaintiffs, to determine if the time is being spent appropriately and for the benefit of Plaintiffs, and to determine and distribute Plaintiffs' attorneys' fees; and
- H. to perform such other duties as may be expressly authorized by further order of this Court.

DATED: \_\_\_\_\_

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HON. ROBERT G. JAMES  
U.S. DISTRICT JUDGE